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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DEBRA D. WILLETT,)	
)	Case No. 2:15-cv-02130-JCM-CWH
Plaintiff,)	
)	
v.)	UNOPPOSED MOTION FOR
)	EXTENSION OF TIME
)	(FIRST REQUEST)
CAROLYN W. COLVIN,)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	
)	

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”) respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm and Response to Plaintiff’s Motion for Remand, due on March 10, 2016, by 30 days, through and including April 11, 2016. There is good cause for this request because agency counsel assigned to the case will be on travel and has an unusually robust caseload, which includes active discovery in an employment matter and an ongoing Bankruptcy investigation. More time is necessary in order to review Plaintiff’s Motion, and to responsibly research and brief this case. This request is made in good faith with no intention to unduly delay the proceedings. Counsel for Defendant conferred with Plaintiff’s counsel, who has no opposition to this motion, on March 1, 2016.

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Respectfully submitted this 2nd day of March 2016.

DANIEL G. BOGDEN
United States Attorney

/s/ Heather M. Moss
HEATHER M. MOSS
Assistant Regional Counsel

OF COUNSEL:

DEBORAH LEE STACHEL
Acting Regional Chief Counsel, Region IX

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: March 3, 2016

CERTIFICATE OF SERVICE

I, **Heather M. Moss**, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

CM/ECF:

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Dated this 2nd day of March 2016.

/s/ Heather M. Moss
HEATHER M. MOSS
Assistant Regional Counsel